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November 26, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Pamela K. Chen, U.S.D.J.
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, NY 11201-1804

Re: IME WatchDog, Inc. v. Gelardi, et al.
Case No.: 1:22-cv-1032 (PKC) (JRC)
MLLG File No.: 25-2022

Dear Judge Chen:

This office, along with Sage Legal LLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case. On September 25, 2024, this Court granted Plaintiff’s and non-party Carlos Roa’s (“Roa”) motion for costs and fees in connection with their motion for contempt against Defendants Safa Abdulrahim Gelardi (“Safa”), Vito Gelardi (“Vito”), and IME Companions LLC (“Companions”) (Safa, Vito, and Companions collectively hereinafter the “Defendants”) and directed them to pay, by November 25, 2024 (i) \$58,358.23 to Plaintiff; and (ii) \$8,099.11 to Roa, for attorneys’ fees and costs. The Court warned Defendants that the failure to timely pay the full amounts could result in further contempt sanctions and/or the imposition of interest. See ECF Docket Entry [394](#).

To date, Defendants have failed to make any payment to Plaintiff and Roa. Accordingly, Plaintiff respectfully requests that the Court enter judgment against them, jointly and severally, and impose sanctions as set forth in this Court’s September 25, 2024 Order. See *Id.* at 22 (“Defendants are warned that the failure to timely pay the full amounts could result in further contempt sanctions and/or the imposition of interest”). A proposed judgment is annexed hereto. Plaintiff thanks this Court for its continued time and attention to this case.

Dated: Lake Success, New York

November 26, 2024

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC
/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York

November 26, 2024

SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.

Enclosure

cc: All Counsel of Record (via ECF)